Hearing Date: 8/10/2026 1:00 PM - 1:05 PM
Location: <<CourtRoomNumber>>
Judge: Calendar, 64

FILED
7/27/2026 12:26 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025CH10558
Calendar, 64
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

FIRST BANK OF HIGHLAND PARK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 2025CH10558
	)	
THE FULTON BUILDING, LLC, *et al.*,	)	2701-09 W. Fulton St., Chicago, IL
	)	
Defendants.	)	

MOTION TO EXTEND TIME

The Defendant, The Fulton Building, LLC, by and through its attorney, Timothy C. Culbertson, moves this Court to issue an Order extending the briefing of Plaintiff's Motion to Appoint a Receiver, and in further support hereof, state as follows:

1. Pursuant to the Court's July 6, 2026, Order Defendant is to file its Response to Plaintiff's Motion to Appoint a Receiver by July 29, 2026.

2. However, Defendant's attorney was hospitalized during the week of July 13, 2026, at Resurrection Medical Center in Chicago with severe Cellulitis. Counsel was discharged late on July 19, 2026, and spent the following week attending follow-up and physical therapy appointments. Accordingly, counsel has been unable to devote the time necessary to properly present the Defendant's position with regard to the pending Motion.

3. Illinois Supreme Court Rule 183 provides in full as follows:

> The court, for good cause shown on motion after notice to the opposite party, may extend the time for filing any pleading or the doing of any act which is required by the rules to be done within a limited period, either before or after the expiration of the time.

4. Accordingly, Defendant requests an extension to August 12, 2026, to file its Response to Plaintiff's pending Motion. Defendant does not seek this extension for the purpose of delay or for

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any other improper purpose, but rather to allow it the opportunity to properly present its side of the issue. Defendant's position on the Motion in part is that there is both a significant equity cushion of at least $2,000,000 above that which is owed to Plaintiff such that Plaintiff's position is adequately protected under any circumstances, and there is a pending re-financing of the property at issue that will render these proceedings moot.

Wherefore the Defendant, The Fulton Building, LLC, prays that this Court issue an Order extending the time for it to file its Response to Plaintiff's Motion to Appoint a Receiver, adjusting the schedule accordingly, and providing to Defendant's favor all further relief as is just and equitable.

The Fulton Building, LLC

By: /s/ Timothy C. Culbertson
Its Attorney

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